

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

COAST TO COAST TITLE, LLC, SOL §
CITY TITLE, LLC, MAGNOLIA TITLE §
ARKANSAS, LTD., MAGNOLIA TITLE §
FLORIDA, LLC, THE PEABODY §
BULLDOG LLC, AND JOHN MAGNESS, §

Plaintiffs, §

v. §

Civil Action No. 4:24-cv-2767

TYRELL L. GARTH, PHILLIP H. §
CLAYTON, STARREX TITLE FLORIDA, §
LLC, LAURIE COOPER, MARKETSTREET §
CAPITAL PARTNERS AR, LLC, §
MARKETSTREET CAPITAL PARTNERS, §
LLC, AND BRIAN A. BREWER, §

Defendants. §

**Stipulation to Extend the Submission Date for
Defendants' Motions to Dismiss to April 16, 2025**

Plaintiffs (Coast to Coast Title, LLC, Sol City Title, LLC, Magnolia Title Florida, LLC, Magnolia Title Arkansas, Ltd. The Peabody Bulldog, LLC, and John Magness) file this stipulation to extend the submission date for Defendants' motions to dismiss to April 16, 2025.

**Stipulation to Extend the Submission Date for
Defendants' Motions to Dismiss to April 16, 2025**

Procedural Posture. Currently pending before the Court is the Document 69 motion to dismiss by Defendants Starrexx et al. and the Document 70 motion to dismiss by Defendants Garth and Clayton. Local Rule 7 makes those motions' default submission date April 11, 2025. The Court has scheduled a hearing on both motions for April 28, 2025. Plaintiffs have conferred with counsel for both sets of Defendants about extending the submission date for those motions, citing as good cause the recent engagement of Plaintiffs' current counsel (both the attorney in charge, Andino Reynal, and of counsel, Chad Flores) and acknowledging all sides' interest in prompt adjudication of the matter. Defendants' counsel promptly replied with courteousness.

Submission Date Extension to April 16. Plaintiffs have expressly requested—and all concerned Defendants are expressly “unopposed” to—a five-day extension of the submission date for the motions to dismiss (Dkt. 69 and Dkt. 70). With this five-day extension, the submission date for the Document 69 and Document 70 motions becomes April 16, 2025. The Court's Case Manager was informed and directed the Plaintiffs to file a stipulation to this effect.

Conclusion

For these reasons, Plaintiffs file this stipulation to extend the submission date for Defendants' Document 69 and Document 70 motions to April 16, 2025.

Respectfully submitted,

/s/ Federico Andino Reynal

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Of Counsel for Plaintiffs

Certificate of Conference

Pursuant to Local Rule 7.1, I certify that on or about April 10 and 11, 2025, Plaintiffs' counsel conferred with counsel for the Defendants regarding this stipulation. The Defendants are "unopposed" to a submission date of April 16, 2025, for the Document 69 and 70 motions.

/s/ Chad Flores

Certificate of Service

I hereby certify that I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to attorneys of record, on April 11, 2025.

/s/ Chad Flores